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Attorney for Defendant
ALLIED COLLECTION SERVICES, INC.

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

MARGARITA CARRERA,

Plaintiff,

vs.

ALLIED COLLECTION SERVICES, INC.,

Defendant.

CASE NO.: 2:22-cv-01604-GMN-DJA

**STIPULATION TO EXTEND TIME
TO RESPOND TO PLAINTIFFS'
COMPLAINT BEYOND 30 DAYS**

Complaint Filed: September 21, 2022

Current Response Date:
October 27, 2022

Proposed New Response Date:
December 16, 2022

Counsel for Defendant, Allied Collection Services, Inc. ("Defendant"), and Counsel for Plaintiff, Margarita Carrera (hereinafter "Plaintiff"), hereby stipulate to extend the time for Defendant to respond to Plaintiff's Complaint, filed on September 21, 2022 and served on Defendant on September 27, 2022. The Parties are actively engaged in ongoing negotiations to resolve this matter and believe an additional fifty (50) days would adequately facilitate the negotiations.

Defendant's response was due on October 27, 2022. Therefore, the Parties request Defendant's deadline be extended by an additional fifty (50) days to December 16, 2022.

This is the Parties first request for a court order extending time for Defendant to respond to the Complaint. This request is made in good faith, and is not being made to delay these

proceedings. Moreover, as stated above, the requested additional time may help facilitate settlement negotiations.

Dated: November 21, 2022

GORDON REES SCULLY MANSUKHANI,
LLP


By: s/Sean P. Flynn
Sean P. Flynn
Daniel A. Mann
Attorneys for Defendant
Fair Collections & Outsourcing, Inc.

Dated: November 21, 2022

FREEDOM LAW FIRM, LLC

By: s/Gerardo Avalos
George H. Haines
Gerardo Avalos
Attorneys for Plaintiff
Margarita Carrera

The court notes that the parties did not cite excusable neglect for missing their original deadline to respond to the complaint as required by Local Rule IA 6-1(a). Nonetheless, the parties assert that they are in the process of negotiating a resolution to this matter. In the interest of promoting that resolution, **IT IS THEREFORE ORDERED** that the parties' stipulation to extend time (ECF No. 5) is **GRANTED**. The parties are reminded to closely follow the Local Rules in seeking any future extensions.



DANIEL J. ALBRECHTS
UNITED STATES MAGISTRATE JUDGE

DATED: November 23, 2022

CERTIFICATE OF SERVICE

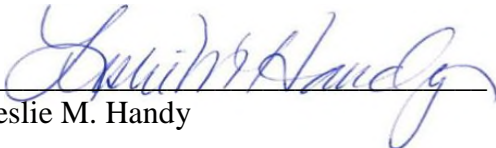
Pursuant to FRCP 5(b), I certify and declare that I am over the age of 18 years; I am an employee of Gordon & Rees LLP, and my business address is 5 Park Plaza, Suite 1100, Irvine, CA 92614. On November 21, 2022, I served a true and correct of the STIPULATION TO EXTEND TIME TO RESPOND TO PLAINTIFFS' COMPLAINT BEYOND 30 DAYS, to the individuals listed below as follows:

George H. Haines, Esq.
Gerardo Avalos, Esq.
8985 South Eastern Ave., Suite 350
Las Vegas, NV 89123
(702) 880-5554
Email: info@freedomlegalteam.com

☒ U.S. Mail Postage Prepaid
☐ CM/ECF
☐ Hand Delivery
☐ Email:

I declare that I am employed in the office of a member of the California State Bar who is permitted to practice before this Court, and at whose direction the service stated above was made in the ordinary course of business. I declare under the penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on November 21, 2022, at Chino Hills, California.



Leslie M. Handy

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